

In the United States District Court
For the State of Delaware.

ORIGINAL

Richard C. Hunt
Plaintiff...

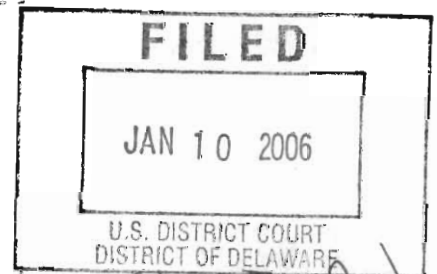
v.

Delaware Correctional Medical
Services.....

Defendant....

Civil Action No.....
04-1417-KAJ

Motion For Appointment
of Counsel



Pursuant to 28 U.S.C. 1915(e)(1).... I, Richard
C. Hunt... moves for an order of appointing of Counsel
to represent me in this case. In support of this
motion,

1.... I, Richard C. Hunt is unable to afford Counsel.
I am requesting leave to proceed in forma
pauperis....

(1)

2. The Plaintiff's imprisonment will greatly be limited my ability to litigate. Where the issues involved in this case are complexed, and will require significant research and a complete investigation is required. Where as the Plaintiff has limited access to the Law Library and have limited knowledge of the law. Where also the Plaintiff has limited access to the Law Library, do to the fact he is house in administrative segregation. Which require Each inmate to order case law by mail with the use's of inmate legal services that my send wrong case law and I may take week's before information is sent by mail.

3. The Plaintiff contend that a trial in this case will likely involve conflicting testimony, and a skilled counsel would better represent the Plaintiff in presenting evidence and cross examine any witnesses.

Where also the Plaintiff has attempted to seek representation on his own and all But one attorney have not responded to any of the letter I wrote. I even wrote the Delaware State Bar Associates Lawyer Referral Service and have received a response back from the letter I sent on Dec 1 2005. (see Exhibit A Page 3.)

4. The Plaintiff contends he has made repeated efforts to obtain a lawyer. See Exhibit (A). The Plaintiff humbly request that this honorable court to appoint a attorney in this case. (See Parham v. Johnson, 126 F.3d 454, 461, 3d Cir. 1997, held that, where a Plaintiff's case appears to have merit and most of the aforementioned factors have been met, a court "must" make every attempt to obtain counsel. See also Nabron v. Grace, 6 F.3d 147, 155-58 (3d Cir. 1993).

Wherefore, Richard C. Hunt Plaintiff humbly request that the court appoint a Pro Bono attorney, a member of the Bar as counsel in this case.

Dated December 16, 2005.

Richard C. Hunt

Richard C. Hunt
Delaware Correctional Center
1181 Paddock Road
Smyrna, Delaware
19977.

In the United State District Court
for the State of Delaware

Richard C. Hunt
Plaintiff

Civil Action No.
04-1417-KA-1

v.

First Correctional Medical
Services
Defendant

Exhibit A.1 Letter to Gary S. Nitsche Jan 8, 2005
Exhibit A.2 Letter to Jeffery K. Martin March 28, 2005
Exhibit A.3 Letter to Jeffery K. Martin Feb. 4, 2005
Exhibit A.4 Letter to Delaware State Bar Associates
Lawyer Referral Service

(Exhibit A)

Dated Dec. 16, 2005.

Richard C. Hunt

Richard C. Hunt
Delaware Correctional Center
1181 Paddock Road
Smyrna, Delaware
19977

IM Richard C. Hunt
SBI# 274714 UNIT 21 DN#4

DELAWARE CORRECTIONAL CENTER

1181 PADDOCK ROAD

SMYRNA, DELAWARE 19977

U.S.M.S.
X-RAY

W
Lego



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United States District Court
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